

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JANE DOE, a sex trafficked individual,

Plaintiff,

v.

WYNDHAM HOTELS & RESORTS, INC.,
BRE/LQ PROPERTIES, LLC, LA QUINTA
INN & SUITES, LA QUINTA HOLDINGS
INC., LQ MANAGEMENT LLC, RANDY
ROES 1-100 (fictitious individuals not yet
known) and ABC CORPORATIONS 1-100
(fictitious businesses and corporations not yet
known),

Defendants.

Civil Action No.: 2:24-cv-11446-MCA-SDA

Hon. Madeline Cox Arleo, U.S.D.J.
Hon. Stacey D. Adams, U.S.M.J.

**JOINT STIPULATION AND ORDER FOR EXTENSION OF TIME TO ANSWER,
MOVE, OR OTHERWISE RESPOND**

Pursuant to Local Rule 6.1, Plaintiff Jane Doe (“Plaintiff”) and Defendants Wyndham Hotels & Resorts, Inc., La Quinta Holdings Inc., LQ Management L.L.C., and CPLG Properties L.L.C. (formerly known as BRE/LQ Properties, L.L.C.) (collectively, the “Defendants”), by and through their respective undersigned counsel, hereby **STIPULATE** and **AGREE** that, upon approval of this Stipulation by the Court:

- The Defendants’ time to answer, move, or otherwise respond to Plaintiff’s Complaint (ECF 1), shall be extended through and including May 19, 2025.

In support of this Stipulation, the parties jointly represent that:

1. Plaintiff filed her Complaint on December 23, 2024;

2. The Defendants waived service of the Complaint on January 14, 2025, rendering a deadline of February 24, 2025 for them to move, answer, or otherwise respond to the Complaint;
3. On February 19, 2025, pursuant to Local Rule 6.1(b), the Clerk of Court granted the Defendants an extension through and including March 10, 2025;
4. On March 10, 2025, pursuant to Local Rule 6.1(b) and upon joint stipulation of the parties, the Court granted the Defendants an extension through and including April 11, 2025;
5. On March 31, 2025, pursuant to Local Rule 6.1(b) and upon joint stipulation of the parties, the Court granted the Defendants an extension through and including May 11, 2025;
6. Plaintiff and the Defendants agree that the extension sought in this Stipulation is acceptable to all parties and will not unduly delay these proceedings.

Dated: April 28, 2025

Respectfully submitted,

SBAITI & COMPANY PLLC

s/ Matthew Sicheri

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*Attorney for Defendants
Wyndham Hotels & Resorts, Inc.,
La Quinta Holdings Inc.,*

*LQ Management L.L.C., and
CPLG Properties, LLC*

The extension request is **GRANTED**.

No further extensions will be permitted
absent exigent circumstances.

SO ORDERED.



Stacey D. Adams
United States Magistrate Judge
Dated: April 30, 2025.